



## GOVERNMENT OF PUERTO RICO

Puerto Rico Fiscal Agency and Financial  
Advisory Authority

### Municipal Secondary Market Disclosure Information Cover Sheet Municipal Securities Rulemaking Board (MSRB) Electronic Municipal Market Access System (EMMA)

#### Additional / Voluntary Disclosure Financial / Operating Data

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**THIS FILING RELATES TO A SINGLE BOND ISSUE:**

Issuer's Name: Puerto Rico Sales Tax Financing Corporation (COFINA)

Name of bond issue: RESTRUCTURED SALES TAX BONDS, SERIES 2019A AND SERIES 2019B

Nine-digit CUSIP number(s): 74529J

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**THIS FILING RELATES TO ALL OR SEVERAL SECURITIES ISSUED BY THE ISSUER, OR ALL OR SEVERAL SECURITIES OF A SPECIFIC CREDITOR:**

Issuer's Name: \_\_\_\_\_

Other Obligated Person's Name (if any): \_\_\_\_\_

Nine-digit CUSIP number(s): \_\_\_\_\_

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**TYPE OF INFORMATION PROVIDED:**

- A. ☐ Quarterly / Monthly Financial Information
- B. ☐ Change in Fiscal Year / Timing of Annual Disclosure
- C. ☐ Change in Accounting Standard
- D. ☐ Interim / Additional Financial Information / Operating Data
- E. ☐ Budget
- F. ☐ Investment / Debt / Financial Policy
- G. ☐ Information Provided to Rating Agency, Credit / Liquidity Provider or Other Third Party
- H. ☐ Consultant Reports
- I. ☒ Other Financial / Operating Data: Notice of Issue Prices

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I represent that I am authorized by the issuer, obligor or its agent to distribute this information publicly.

/s/ Sebastián M. Torres Rodríguez

Sebastián M. Torres Rodríguez

Puerto Rico Fiscal Agency and Financial Advisory Authority,  
as Fiscal Agent for the Commonwealth

Dated: March 20, 2019



**Notice of Issue Prices of**  
**Puerto Rico Sales Tax Financing Corporation (COFINA)**  
**Restructured Sales Tax Bonds, Series 2019A and Series 2019B (COFINA Bonds)**  
**Issued on February 12, 2019**

The chart below sets forth COFINA's determination of the issue price of each maturity of its Restructured Sales Tax Bonds (per \$1,000 principal amount) issued for COFINA Sales Tax Revenue Bonds tendered on February 12, 2019 (the "Settlement Date") pursuant to the terms of the Third Amended Title III Plan of Adjustment of Puerto Rico Sales Tax Financing Corporation and that certain Amended Order and Judgment Confirming the Third Amended Title III Plan of Adjustment of Puerto Rico Sales Tax Financing Corporation.

<b>COFINA Bonds</b>	<b>Tax Status on Settlement Date</b>	<b>Interest Rate and Final Maturity</b>	<b>Accretion Yield for 0.00% Coupon Bonds</b>	<b>CUSIP Numbers</b>	<b>Fair Market Value per \$1,000 of principal (excluding any pre-issuance accrued interest)</b>	<b>Issue Price (Percent of Initial Principal Amount)</b>
2019A-1, 2019B-1	Tax-exempt	4.50% due 2034	N/A	74529JPU3, 74529JQJ7	\$992.80	99.280
2019A-1, 2019B-1	Tax-exempt	4.55% due 2040	N/A	74529JPV1, 74529JQK4	\$981.00	98.100
2019A-1, 2019B-1	Tax-exempt	4.75% due 2053	N/A	74529JPW9, 74529JQL2	\$941.37	94.137
2019A-1, 2019B-1	Tax-exempt	5.00% due 2058	N/A	74529JPX7, 74529JQM0	\$974.16	97.416
2019A-2, 2019B-2	No tax- exemption opinion	4.55% due 2040	N/A	74529JPY5, 74529JQY4, 74529JQN8	\$829.61	82.961
2019A-2, 2019B-2	No tax- exemption opinion	4.75% due 2053	N/A	74529JPZ2, 74529JQP3	\$819.68	81.968
2019A-2, 2019B-2	No tax- exemption opinion	5.00% due 2058	N/A	74529JQA6, 74529JQQ1	\$836.18	83.618

2019A-1, 2019B-1	Tax-exempt	0.00% due 2024	4.250%	74529JQB4, 74529JQR9	\$805.33	80.533
2019A-1, 2019B-1	Tax-exempt	0.00% due 2027	4.375%	74529JQC2, 74529JQS7	\$697.00	69.700
2019A-1, 2019B-1	Tax-exempt	0.00% due 2029	4.375%	74529JQD0, 74529JQT5	\$620.03	62.003
2019A-1, 2019B-1	Tax-exempt	0.00% due 2031	4.500%	74529JQE8, 74529JQU2	\$551.49	55.149
2019A-1, 2019B-1	Tax-exempt	0.00% due 2033	4.500%	74529JQF5, 74529JQV0	\$484.34	48.434
2019A-1, 2019B-1	Tax-exempt	0.00% due 2046	5.375%	74529JQG3, 74529JQW8	\$202.92	20.292
2019A-1, 2019B-1	Tax-exempt	0.00% due 2051	5.625%	74529JQH1, 74529JQX6	\$148.43	14.843

In determining the issue price of debt instruments such as the COFINA Bonds, U.S. Treasury Regulation Section 1.1273-2(f) requires the issuer to determine whether the debt instrument is “traded on an established market (publicly traded)” and, if so, the fair market value of the debt instrument as of the issue date. U.S. Treasury Regulation Section 1.1273-2(f) requires the issuer to make this information available to holders in a commercially reasonable fashion, including by electronic publication, within 90 days of the date of issue of the debt instrument.

In accordance with U.S. Treasury Regulation Section 1.1273-2(f)(9)(i), COFINA collected information regarding the prices at which such COFINA Bonds were sold on the first date on which there were sales of the COFINA Bonds, February 15 and February 19, 2019 (the “First Trade Dates”), as there was no information on firm price quotes or indicative price quotes available to COFINA for earlier dates. Based on such information, although no assurance can be given, COFINA determined that the COFINA Bonds were “publicly traded” for purposes of the regulations under Section 1273 of the Internal Revenue Code of 1986, as amended (the “Code”), and U.S. Treasury Regulation Section 1.1273-2(f). Pursuant to Section 1273 of the Code, the issue price of publicly traded debt instruments is based on their fair market value. In accordance with U.S. Treasury Regulation Section 1.1273-2(f), the fair market value of the COFINA Bonds, as determined by COFINA was based on the weighted average price at which each of the COFINA Bonds traded on the respective First Trade Date on which each traded, and is set forth in the sixth column of the chart above per \$1,000 of principal amount. COFINA was advised that interest rates on Treasury securities of various maturities changed by no more than 5 basis points (approximately) between the issue date of the COFINA Bonds and February 19, 2019. COFINA was also advised that yields of various tax-exempt securities as measured by the Municipal Market Data (MMD) index changed by no more than 1 basis point (approximately) between the issue date of the COFINA Bonds and February 19, 2019. Accordingly, COFINA has made no adjustment to the fair market value to reflect the use of the First Trade Dates. The last

column of the chart above provides the issue price as a percent of the initial principal amount of the COFINA Bonds. COFINA has established the issue price of the Series 2019B Bonds based on the sale prices of the Series 2019A Bonds.

The COFINA Bonds of each series also bore interest from their dated date of August 1, 2018 until the Settlement Date (referred to as “pre-issuance accrued interest”). Such amounts were paid to bondholders on the Settlement Date and therefore are not included in the determinations of fair market value set forth above pursuant to U.S. Treasury Regulation Section 1.1273-2(m).

This notice is only intended to fulfill COFINA’s notification obligation under the U.S. Treasury Regulations and does not constitute tax advice. U.S. Treasury Regulation Section 1.1273-2(f)(9)(i) provides that COFINA’s determination of the issue price of each series of COFINA Bonds is binding upon a holder unless such holder explicitly discloses to the Internal Revenue Service, on a timely filed U.S. federal income tax return for the taxable year that includes the Settlement Date, that its determination of the issue price is different from that of COFINA’s, the reasons for the different determination, and how such holder determined the issue price. In this regard, holders of COFINA Bonds should consult their own tax advisors regarding the determination of the issue price of the COFINA Bonds described above, including the treatment of pre-issuance accrued interest.